

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW HAMPSHIRE

“BARBARA;” “SARAH,” by guardian, parent,  
and next friend “SUSAN;” and “MATTHEW,”  
by guardian, parent, and next friend “MARK;”  
on behalf of themselves and all those similarly  
situated,

*Plaintiffs,*

v.

DONALD J. TRUMP, President of the United  
States, in his official capacity, et al.,

*Defendants.*

Case No. 1:25-cv-244

**ASSENTED-TO MOTION FOR THE ADMISSION *PRO HAC VICE* OF  
ZACHARY L. HEIDEN**

1. Pursuant to Rule 83.2(b) of the Local Rules of the United States District Court for the District of New Hampshire, Plaintiffs respectfully move this court for an order admitting Zachary L. Heiden to the bar of this Court, *pro hac vice*, for the purpose of representing Plaintiffs in the above-captioned case. Mr. Heiden is knowledgeable regarding the dispute between the parties, and it would be economical and efficient to allow Mr. Heiden to appear before this Court.

2. Mr. Heiden is a member in good standing of the bars of the State of Maine, U.S. District Court for the District of Maine, United States Court of Appeals for the First Circuit, and United States Supreme Court; he is not suspended or disbarred in any jurisdiction or involved in any disciplinary proceedings; and he has never had *pro hac vice* status denied or revoked by any court. An affidavit attesting to these facts is attached.

3. For the foregoing reasons, Plaintiffs respectfully request that this Court grant this motion and enter an order for admission of Mr. Heiden *pro hac vice* in the above-captioned case.

4. Defendants, through counsel, assent to this motion.

WHEREFORE, Plaintiffs respectfully request that this Honorable Court:

- A. Grant this Motion for Admission *Pro Hac Vice* of Zachary L. Heiden; and
- B. Grant such other and further relief as may be just and equitable.

Date: June 28, 2025

Respectfully submitted,

/s/ SangYeob Kim

SangYeob Kim (N.H. Bar No. 266657)  
Gilles R. Bissonnette (N.H. Bar No. 265393)  
Henry R. Klementowicz (N.H. Bar. No. 21177)  
Chelsea Eddy (N.H. Bar No. 276248)  
AMERICAN CIVIL LIBERTIES UNION OF NEW  
HAMPSHIRE FOUNDATION  
18 Low Avenue  
Concord, NH 03301  
Tel. 603.224.5591  
sangyeob@aclu-nh.org  
gilles@aclu-nh.org  
henry@aclu-nh.org  
chelsea@aclu-nh.org

*Counsel for Plaintiffs*